

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

SCOTT PURRONE, Derivatively on behalf of
ENVISION HEALTHCARE CORPORATION
f/k/a/ ENVISION HEALTHCARE
HOLDINGS, INC.,

Plaintiff,

vs.

WILLIAM A. SANGER, CHRISTOPHER A.
HOLDEN, CAROL J. BURT, JAMES A.
DEAL, LEONARD M. RIGGS, JR., JOHN T.
GAWALUCK, STEVEN I. GERINGER,
JAMES D. SHELTON, JOEY A. JACOBS,
MICHAEL L. SMITH, CYNTHIA S. MILLER,
KEVIN P. LAVENDER, RANDEL G. OWEN,
CLAIRE M. GULMI, MARK V. MACTAS,
RICHARD J. SCHNALL, and RONALD A.
WILLIAMS,

Defendants,

– and –

ENVISION HEALTHCARE CORPORATION
f/k/a/ ENVISION HEALTHCARE
HOLDINGS, INC., a Delaware Corporation,

Nominal Defendant.

Lead Civil Action No. 3:17-cv-01472
(Consolidated with Nos. 3:17-cv-01550,
3:17-cv-01570)

Judge William L. Campbell, Jr.

Magistrate Judge Jeffery S. Frensley

JOINT STATUS REPORT AND MOTION TO STAY ACTION

Plaintiffs Scott Purrone and Ryan Sevy ("Plaintiffs"), defendants William A. Sanger, Christopher A. Holden, Carol J. Burt, James A. Deal, Leonard M. Riggs, Jr., John T. Gawaluck, Steven I. Geringer, James D. Shelton, Joey A. Jacobs, Michael L. Smith, Cynthia S. Miller, Kevin P. Lavender, Randel G. Owen, Claire M. Gulmi, Mark V. Mactas, Richard J. Schnall, Ronald A. Williams (the "Individual Defendants"), and nominal defendant Envision Healthcare Corporation ("Envision" or the "Company," and, with the Individual Defendants, "Defendants") respectfully submit this joint status report and motion to stay pursuant to the Court's order dated August 20,

2018, to update the Court on the status of the Parties' meet and confer efforts and the general status of this action.

The Parties have met and conferred on the various issues raised in the Proposed Initial Case Management Order filed on August 9, 2018, and have agreed as follows:

A. Plaintiffs have dismissed without prejudice any and all class claims set forth in the Verified Amended Stockholder Derivative and Class Action Complaint ("Amended Complaint") filed in this Action on August 2, 2018. (Dkt. No. 41.)

B. The parties have agreed to a stay of all proceedings on Plaintiffs' remaining derivative claims, pending the outcome of the proposed acquisition of Envision (the "Acquisition"), which is scheduled for a shareholder vote on September 11, 2018.

C. Following the closing of the Acquisition (or the Acquisition's failure to close), should Plaintiffs intend to pursue this action, the Parties shall meet and confer regarding a schedule for the filing of any amended pleading and responsive motion or pleading. Defendants shall not be required to respond to the Amended Complaint or any other pleading filed in this action pending further agreement of the Parties or order of the Court.

For the foregoing reasons, the parties respectfully request that the Court stay further proceedings in this Action pending the outcome of the Acquisition. The parties will confer and file an updated status report within 30 days of the closing of the Acquisition or a determination that the Acquisition will not close.

Dated: August 30, 2018

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Ronald A. Williams and nominal defendant
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CERTIFICATE OF SERVICE

I hereby certify that on **August 30, 2018**, the parties' **Joint Status Report and Motion to Stay Action** was filed electronically with the Clerk of the Court and served by operation of the Court's CM/ECF system on the following parties:

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